

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

UNITED STATES OF AMERICA

V.

JOSE LUIS TREJO

§
§
§
§
§

Cr. No. 7:20-cr-01676-1

**DEFENDANT’S MOTION TO AMEND TERMS AND CONDITIONS OF RELEASE TO
ALLOW DEFENDANT TO TRAVEL**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, Defendant, **Jose Luis Trejo**, by and through his undersigned counsel and moves this honorable court to amend the terms and conditions of his release on bail to allow him to travel to Miami, FL, and in support thereof would respectfully show:

I.

Defendant is set for final pretrial conference on September 3, 2021 and Jury trial on September 8, 2021 before this honorable court.

II.

Defendant requests permission to travel to Miami, FL while he is out on bond. Defendant would be traveling to the “FIME” International Medical Equipment, Inc. medical trade fair and exhibition conference held in Miami, FL. This is the only used medical equipment convention held in North America, therefore it is a critical event for Defendant’s business as a medical supply monger. Further details can be found

at <https://www.fimeshow.com/en/home.html>. Defendant would be traveling from August 29, 2021 to September 4, 2021. Defendant would be at the Miami Beach convention center and its' environs.

III.

Defendant represents to the court that he continues to abide by all the requirements of his release on bail and will be present in court on the date ordered by this honorable court.

IV.

A.U.S.A. Roberto Lopez, Jr., is unopposed.

WHEREFORE, PREMISES CONSIDERED, defendant prays that the honorable court amend his terms and conditions of release to permit him to travel to Miami, FL.

Respectfully submitted,

/s/Alejandro Ballesteros

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*Attorneys for Defendant
Jose Luis Trejo*

Certificate of Service

On August 4, 2021 this unopposed motion was filed via ECF and served upon Assistant U.S. Attorney, Roberto Lopez.

/s/Alejandro Ballesteros
Alejandro Ballesteros

Certificate of Conference

On August 4, 2021, Assistant U.S. Attorney for the Southern District of Texas, Mr. Roberto Lopez, was consulted and is not opposed to this motion.

/s/Alejandro Ballesteros
Alejandro Ballesteros

